FLORIDA STATE UNIVERSITY

POLICY 7A-8

RESPONSIBLE CONDUCT OF RESEARCH (RCR) TRAINING

Responsible Executive: Gary K. Ostrander, Vice President for Research

Approving Official: Gary K. Ostrander, Vice President for Research

Effective Date: January 4, 2010

Revision History: Readopted: August 1, 2014

                        Revised: May 20, 2015

I. Introduction

Certain Federal funding agencies have adopted requirements for training in the responsible conduct of research for certain individuals supported by or participating in projects funded by those agencies. This document outlines FSU's policy and procedures for ensuring compliance with these requirements. The Director of the Office of Research Compliance Programs (ORCP) is responsible for overseeing compliance with requirements for training in the responsible conduct of research.

II. Policy

This policy applies to all individuals receiving salaries, stipends, one-time payments, or other support from certain Federal funding agencies requiring training on the Responsible Conduct of Research (RCR). In addition, USDA requires that all individuals participating in the research project receive training, not just those financially supported by the award.

As FSU is committed to promoting a culture of ethical and responsible research, all faculty, staff, students, and visitors engaged in research are encouraged to pursue training in this area.

As of this date, those agency requirements, as well as FSU's related procedures, are as follows:

The **National Science Foundation (NSF)** requires FSU to certify in each application for funding that it has a plan in place to provide appropriate training and oversight in the responsible and ethical conduct of research for *undergraduates, graduate students, and postdoctoral researchers* who will be supported by NSF to conduct research. NSF's policy was effective January 4, 2010. FSU's Policy 7A-8, *Responsible Conduct of Research (RCR) Training*, will serve as the plan referred to in the certification. NSF Principal Investigators are responsible for ensuring that all undergraduates, graduate students, and postdoctoral researchers supported by NSF funds obtain the required training in a timely manner (see Timing of Training below). PIs are not required to report the RCR training in annual and final technical report submitted to NSF. Training Options 1, 2, and 3, shown below, will satisfy this requirement.

The ORCP will prepare a report of students and trainees who are supported from NSF-funded projects each semester which will be matched against CITI (Collaborative Institutional Training Initiative) and FSU training completion records. Principal Investigators will be notified of any noncompliance. Documentation of compliance will be maintained by the ORCP and made available to NSF upon request.

The **National Institutes of Health (NIH)** requires all *trainees, fellows, participants, and scholars* receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant receive training in the Responsible Conduct of Research. NIH's policy was effective January 25, 2010, and applies to the following programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R. This policy also applies to any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcements.

NIH Principal Investigators are responsible for including information about their RCR training plan in every New (Type 1) and Renewal (Type 2) application, as well as Type 5 Continuation applications. Detailed requirements for each type of application were published in NIH Notice [NOT-OD-10-019](#), *Requirement for Instruction in the Responsible Conduct of Research.* PIs are also responsible for ensuring that all undergraduates, graduate students, and postdoctoral researchers supported by NIH funds obtain the required training in a timely manner (see Timing of Training below). Training Options 1 and 3, shown below, will satisfy this requirement fully. Option 2 may only be used to partially satisfy the requirements, because NIH requires 8 hours of face-to-face discussions in addition to online training.

NIH provides the following guidance related to frequency of instruction:

> Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years. It is highly encouraged that initial instruction during predoctoral training occurs as early as possible in graduate school. Individuals at the early career investigator level (including mentored K awardees and K12 scholars) must receive instruction in responsible conduct of research at least once during this career stage. Senior fellows and career award recipients (including F33, K02, K05, and K24 awardees) may fulfill the requirement for instruction in responsible conduct of research by participating as lecturers and discussion leaders. To meet the above requirements, instruction in responsible conduct of research may take place, in appropriate circumstances, in a year when the trainee, fellow or career award recipient is not actually supported by an NIH grant.

"Career stage" includes the undergraduate, post-baccalaureate, predoctoral, postdoctoral, and faculty levels.

NIH Principal Investigators are responsible for maintaining documentation of the training plan associated with each project, as well as records of all NIH-supported trainees, fellows,

participants, and scholars who received the required training. Documentation of compliance will be maintained by the NIH Principal Investigator and made available to the ORCP and NIH upon request. Documentation includes, but is not limited to, CITI Completion Reports, class rosters with passing indicator, signed/dated faculty notes, etc.

The **U.S. Department of Agriculture, National Institute of Food and Agriculture (NIFA)** terms and conditions state: "By accepting a NIFA award the grantee assures that *program directors, faculty, undergraduate students, graduate students, postdoctoral researchers, and any staff participating in the research project* receive appropriate training and oversight in the responsible and ethical conduct of research." NIFA's policy was effective February 2013.

NIFA Principal Investigators are responsible for ensuring that each individual participating in the research project obtains the required training in a timely manner (see Timing of Training below). Training Option 2 shown below will satisfy this requirement. However, participation in the more substantive face-to-face courses possible through Options 1 and 3 is strongly encouraged.

By June 1 of each year, the ORCP will ask NIFA Principal Investigators to provide a list of all individuals who participated in the research project during the previous 12 months. The ORCP will match this data against CITI and FSU training completion records to ensure that all individuals received training. Documentation of compliance will be maintained by the ORCP and made available to NIFA upon request.

Key Differences

Please note the following key differences among these three agencies' policies:

- NSF requirements apply to research grants. Students who receive only scholarship or stipend support to enroll in an academic program through such NSF programs as S-STEM and Noyce are not required to receive RCR training. However, students must take RCR training if they receive NSF scholarship or stipend support to engage in research, or if conducting research is included in their academic program.
- NIH requirements apply to education and training grants.
- UDSA requirements apply to *all* individuals *participating* in the research project, not just postdoctoral researchers and students financially supported by the grant.

Timing of Training

Postdoctoral fellows, graduate students, and USDA/NIFA project staff must complete their training within two (2) months *of their initial appointment or assignment to the grant. Undergraduates must complete their training within* one (1) month *of their initial appointment or assignment to the grant.*

Training Options

At this time the university has stipulated three options for meeting these training requirements:

Option 1 (only available to graduate students) is to complete satisfactorily the FSU RCR course offered by the Graduate School each spring semester, http://gradschool.fsu.edu/Academics-Research/Research-and-Scholarly-Integrity/FSU-s-RCR-Course. A graduate student who has already satisfactorily completed the course prior to being supported by or assigned to a project subject to RCR training regulations satisfies this requirement. In addition, if the first semester of appointment or assignment to an applicable project is spring, a student can satisfy this option by being simultaneously enrolled in the RCR course and completing it satisfactorily. Graduate students who have not successfully completed the above course or who are not enrolled in it must select the second option for satisfying the RCR training requirement.

Option 2 is for postdoctoral fellows, graduate and undergraduate students being supported by a project subject to RCR training regulations, to complete the online training course offered by CITI (Collaborative Institutional Training Initiative). This Option is also available to any staff member participating in, but not necessarily supported by, a USDA/NIFA project. (USDA/NIFA project staff should elect to complete the *postdoctoral fellows* portion of the training.)

The CITI RCR online training course for postdoctoral fellows and graduate students requires approximately five to seven hours for completion. The online course for undergraduates will take approximately four to five hours. Instructions for registering and taking the CITI courses can be found at the following link: http://gradschool.fsu.edu/Academics-Research/Research-and-Scholarly-Integrity/FSU-s-CITI-Courses.

Option 3 is to complete satisfactorily an approved departmental course in the Responsible Conduct of Research. If the first semester of appointment or assignment to project subject to RCR training regulations is the first semester of enrollment at FSU, then the student can be simultaneously enrolled in the course and meet the requirement. If the course is not completed satisfactorily, the student cannot continue working on the Federal award. Re-appointment requires satisfactory completion of Options 1, 2, or 3.

New Course Proposals

Academic programs interested in offering a course that satisfies Option 3 should submit a "Proposal for Consideration of a Departmental Course to Meet the RCR Requirement" to Dr. Judy Devine in the Graduate School (jdevine@admin.fsu.edu). This document should be submitted in electronic format (preferably as a .pdf). The proposal will be reviewed by the Graduate School and the Office of Research, and, if necessary, by members of the Council on Research and Creativity.

The proposal should include the following elements:

1. The syllabus approved by the university curriculum committee.
2. Explanation as to how the course addresses each of the following topics highlighted by NIH's Office of Research Integrity.
   o General research misconduct and professional standards
   o Falsification, fabrication, plagiarism
   o Human subjects protection (if applicable)
   o Welfare of animals used in research (if applicable)
   o Conflicts of interest
   o Data management practices

- o Mentor and trainee responsibilities
- o Collaborative research
- o Authorship and publication
- o Peer review
3. Explain how learning will be assessed.

If the course is letter graded, satisfactory completion by the student to meet the Federal RCR training requirements requires a grade of B or better. If the course is S/U graded, specific benchmarks must be identified for attainment of satisfactory performance. Regardless of the grading format, a rigorous mechanism for assessment of learning must be in place. This should be described in the proposal (point 3 above).

The proposal should indicate how often the course is offered; whether it will be online, face-to-face, or a combination of both; and whether the course will be open to students from other programs. A list of approved FSU courses that meet Federal RCR training requirements will be published on the ORCP website.

Proposals will be considered at any time of the year.

List of Trained Personnel

The names of individuals who complete the CITI course and/or an FSU RCR course will be posted on the Blackboard site of the Office of Research by the ORCP on the first day of each month. To access this list, log into Blackboard, choose **FSU Office of Research** under "Courses and Orgs" and then click on **RCR Course Data** on the left panel.

Contacts

For questions about Federal RCR policies, please contact Diana Key (dkey@fsu.edu), Director of Research Compliance Programs.

For questions about RCR courses, please contact Dr. Judy Devine (jdevine@admin.fsu.edu), Senior Associate Dean of the Graduate School.

III. Legal Support, Justification, and Review of this Policy

National Science Foundation, *Responsible Conduct of Research*, as published in NSF's Award and Administration Guide 15-1.

National Institutes of Health, *Requirement for Instruction in the Responsible Conduct of Research*, as published in Notice No. NOT-OD-10-019.

U.S. Department of Agriculture, National Institute of Food and Agriculture (NIFA), *Responsible and Ethical Conduct of Research*, as published in the Federal-Wide Research Terms and Conditions, NIFA Agency-Specific Terms and Conditions, February 2013,

Fla. Stat. 1004.22.

This policy will be reviewed periodically and updated when changes are necessary.

Gary K. Ostrander, Vice President for Research

May 20, 2015